

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

OUTMEMPHIS, et al.,

Plaintiffs,

v.

BILL LEE, et al.,

Defendants.

Civil Action No. 2:23-CV-2670

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF TENNESSEE, et al.,

Defendants.

Civil Action No. 2:24-CV-2101

Chief Judge Lipman

MOTION TO COMPEL DISCOVERY RESPONSES

Plaintiffs respectfully move to compel Defendants to respond to Plaintiffs' first Requests for Production, served on March 26, 2024. *See* ECF No. 71.

This motion is made upon Plaintiffs' Memorandum of Law in Support of the Motion to Compel and the Declaration of Alexis Alvarez.

Plaintiffs request argument only in the event the Court has any questions that are not addressed in Plaintiffs' filing.

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2, Counsel for Plaintiffs certify that the parties have consulted regarding this Motion and have been unable to reach accord. Specifically, Plaintiffs' counsel and Defendants' counsel have conferred over email multiple times between March 27, 2024 and May 3, 2024 but have not been able to reach agreement.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 6th day of May 2024, upon:

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Dated: May 6, 2024

Respectfully submitted,

/s/ Alexis Alvarez

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**Admitted Pro Hac Vice*